

September 11, 2001

Ms. Christie Whitman, Administrator
US Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

ATTN: Chemical Right-to-Know Program

Dear Ms. Whitman:

On behalf of the members of the Phosphite Producers HPV Consortium (PPHC), GE Specialty Chemicals is pleased to submit the attached category definition and rationale, category test plan, and robust summaries for proposed members of the category. We understand there will be a 120-day review period for the submission and that all comments received by EPA will be forwarded to the PPHC through the undersigned for consideration.

The category includes the following materials:

Phosphorus Acid, Triphenyl Ester	(CAS # 000101020)
Phosphorus Acid, Isodecyl Diphenyl Ester	(CAS # 026544230)
Phosphorus Acid, Diisodecyl Phenyl Ester	(CAS # 025550985)
Phosphorus Acid, Triisodecyl Ester	(CAS # 025448253)

We are submitting this document (category definition and rationale, test plan, and robust summaries) directly to EPA to make available to the public. This submission includes one electronic copy in Microsoft Word and a second hard copy. These materials should be filed under the EPA registration number 1101106 (Phosphite Producers HPV Consortium).

If you have any questions regarding this submission, please contact me at the address shown above, by telephone at 413-448-6323, by FAX at 413-236-6018, or by e-mail at Ronald.Joiner@GEP.GE.com.

Sincerely,

RONALD L. JOINER, PH.D.
Manager, Global Toxicology
General Electric Company